

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

BENJAMIN BIN CHOW,)	
)	
Plaintiff,)	
)	
v.)	
)	
CANYON BRIDGE CAPITAL PARTNERS,)	
LLC, a Cayman Islands Limited Liability)	
Company, CANYON BRIDGE CAPITAL)	C.A. No. 22-00947-JLH-SRF
MANAGEMENT, LLC, a Delaware Limited)	
Liability Company, CANYON BRIDGE)	
FUND I, LP, a Cayman Islands Limited)	
Partnership, HONG JOHN KAO, HEBER)	
RAYMOND BINGHAM, and PETER CHIN)	
KUO,)	
)	
Defendants.)	

MOTION FOR TELECONFERENCE TO RESOLVE DISCOVERY DISPUTE

Plaintiff respectfully moves this Court to schedule a teleconference to address an outstanding dispute regarding the following matter:

- **Defendants’ refusal to agree to a two-week extension of Plaintiff’s deadline to serve discovery responses and objections from June 30, 2025 to July 14, 2025.**

The following attorneys, including at least one Delaware Counsel per party, participated in a verbal meet-and-confer (by telephone) on the following date(s): June 23, 2025.

Delaware Counsel for Plaintiff:
Jason Z. Miller
SMITH, KATZENSTEIN & JENKINS, LLP

Delaware Counsel for Defendants:
Jesse L. Noa
POTTER ANDERSON & CORROON LLP

Given that the dispute centers around discovery responses that are due to be served on June 30, 2025, the parties, based on joint availability respectfully submit that they are available for a teleconference on the following dates: June 25, 2025 after 11 a.m.; June 26, 2025 after 12 p.m., all day Friday, June 27, 2025. Plaintiff's counsel apologizes to the Court for the last-minute nature of this request. Additionally, Plaintiff can file his discovery dispute letter submission immediately upon the Court's direction.

Dated: June 23, 2025

Of counsel:

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